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Aaron Dicus, and Gustavo Sanchez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

REGINALD HOWARD,
Plaintiff,
vs.
S. FOSTER, et al.,
Defendants.

CASE NO. 2:13-cv-01368-RFB-NJK

**STIPULATION TO EXTEND CERTAIN
POST-TRIAL DEADLINES PENDING
POSSIBLE RESOLUTION OF
MATTER**

(Second Request)

Defendants, Sean Bloomfield, Aaron Dicus, and Gustavo Sanchez, by and through counsel, Attorney General Adam Paul Laxalt, and Senior Deputy Attorney General Frank A. Toddre II, of the State of Nevada, Office of the Attorney General, along with Plaintiff Reginald Howard, by and through his attorneys, Margaret A. McLetchie and Alina M. Shell, of the law firm McLetchie Law and hereby agree and stipulate to extend certain post-trial deadlines.

First, the deadline for Plaintiff to submit a proposed order with underlying documentation as to fees and costs pursuant to 42 U.S.C. § 1988. (ECF No. 142) shall be extended from November 19, 2018 to December 21, 2018.

Second, Defendants have filed a Motion for Reconsideration under Rule 59. (ECF No. 145). Plaintiff's deadline to respond to that Motion shall be extended from December 18, 2018 to January 17, 2019.

1 Third, Defendants have filed a Limited Objection to the Bill of Costs filed by Plaintiff
2 on September 20, 2018 (ECF No. 146). Plaintiff's reply, if any, to any Objection shall be
3 extended from November 13, 2018 until December 21, 2018.

4 This Stipulation is not sought for any improper purpose or other purpose of delay,
5 but in the interest of effectively representing both parties' interests in this matter. The
6 parties are currently discussing settlement and wish to reduce the accumulation of
7 attorney's fees.

8 Counsel has been working further to resolve outstanding appellate matters relating
9 to Howard's Appeal in Ninth Circuit Case No. 18-16969. Lastly, Counsel for Defendants
10 will be out of jurisdiction from November 13, 2018 until November 22, 2018, and will not
11 have any access to e-mail or State files.

12 IT IS SO STIPULATED.

13 DATED this 13th day of November, 2018.

DATED this 13th day of November, 2018.

14 /s/ Alina M. Shell
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16 Nevada Bar No. 10931
17 ALINA M. SHELL
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21 **ORDER**

22 IT IS SO ORDERED.

24 DATED: November 26, 2018.

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RICHARD F. BOULWARE, II
United States District Judge